

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JOHN NANNI,

Plaintiff,

V.

DDR NOBLE TC TRUST,

Defendant.

Case No. 2:14-cv-06805-MAK

Hon. Mark A. Kearney

MOTION FOR *PRO HAC VICE* ADMISSION OF BRIAN T. KU

Pursuant to Local Civil Rule 83.5.2(b), plaintiff John Nanni hereby moves for the *pro hac vice* admission of attorney Brian T. Ku, a partner at the law firm of Ku & Mussman, P.A. and submits the following in support thereof:

1. The motion for *pro hac vice* admission of Brian T. Ku filed on March 31, 2015 (Dkt. No. 24), including the “Application Form for Those Attorneys Seeking to Practice in This Court Pursuant to Local Rule of Civil Procedure 83.5.2(b),” is incorporated by reference and re-submitted herewith.
2. The undersigned counsel is admitted to practice and in good standing before this Court, and has appeared in the above-captioned case. *See* Section II of the “Application Form for Those Attorneys Seeking to Practice in This Court Pursuant to Local Rule of Civil Procedure 83.5.2(b),” (Sponsor’s statement).
3. This motion is made at the request of plaintiff John Nanni, because Mr. Ku has served as defendant’s national counsel in cases arising under Title III of the Americans with Disabilities Act and is familiar with the facts underlying this litigation. His assistance and participation is necessary to John Nanni’s representation in this proceeding.
4. Counsel for defendant DDR Noble TC Trust does consent to this motion.

Dated: June 1, 2015.

Respectfully Submitted,

By: /s/ J. Christopher Froelich

KU & MUSSMAN, P.A.

Attorney for Plaintiff

J. Christopher Froelich

Of Counsel

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Counsel for Plaintiff John Nanni

received any public reprimand by the disciplinary authority of any bar of which I am a member.

4. I have read the most recent edition of the Pennsylvania Rules of Professional Conduct and the Local Rules of this Court. I agree to be bound by these Rules for the duration of the above-captioned case.
5. If granted the *pro hac vice* sought herein, I will in good faith continue to advise my associate counsel, J. Christopher Froelich, of the current status of this case and of all material developments therein.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of June, 2015.



Brian T. Ku, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2015, I electronically filed the foregoing, using the CM/ECF system and a true and correct copy has been by U.S. Mail to:

Carl W. Hittinger, Esq.
M. Mitchell Oates, Esq.
Jeffrey W. Duffy, Esq.
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By: /s/ J. Christopher Froelich
J. Christopher Froelich, Esq.